

Cliff Fonstein
Joanne Seltzer
Sidley Austin LLP
787 Seventh Avenue
New York, New York 10019
(212) 839-5300

Attorneys for Defendants
Deutsche Bank Securities Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DANIEL B. GRAVES,

Plaintiff,

- against -

DEUTSCHE BANK SECURITIES INC.,

Defendant.

ECF CASE

07 Civ. 5471 (BSJ) (KNF)

**NOTICE OF MOTION TO COMPEL
THE PRODUCTION OF
DOCUMENTS CLAWED-BACK BY
PLAINTIFF PURSUANT TO RULE
26(b)(5)(B)**

To: Richard T. Seymour
Law Office of Richard T. Seymour, P.L.L.C.
1150 Connecticut Avenue N.W., Suite 900
Washington, D.C. 20036-4129

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and Affirmation of Joanne Seltzer, the undersigned will move this Court before the Honorable Kevin N. Fox at the United States District Court, 500 Pearl Street, New York, New York, 10007 for an order compelling the production of documents clawed-back by Plaintiff Daniel B. Graves pursuant to Rule 26(b)(5)(B) of the Federal Rules of Civil Procedure.

Dated: January 27, 2011

Respectfully submitted,

SIDLEY AUSTIN LLP

By: 

Cliff Fonstein
Joanne Seltzer
787 Seventh Avenue
New York, New York 10019
(212) 839-5300
cfonstein@sidley.com
jseltzer@sidley.com

Attorneys for Defendant
Deutsche Bank Securities Inc.